



U.S. Department of Justice

United States Attorney  
Southern District of New York

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86 Chambers Street  
New York, New York 10007

July 1, 2022

VIA ECF

Hon. Ronnie Abrams  
United States District Judge  
United States District Court  
40 Foley Square  
New York, New York 10007

**Re: *Mancera v. Jaddou*, No. 21 Civ. 5698 (RA)**

Dear Judge Abrams:

This Office represents the government in the above-referenced action in which the plaintiff seeks an order compelling U.S. Citizenship and Immigration Services (“USCIS”) to adjudicate a Petition for Alien Entrepreneur (Form I-526). On June 21, 2022, the government filed a motion to dismiss this matter. *See* ECF Nos. 20-21. I write respectfully to correct a statement in the government’s motion to dismiss and to request to stay this matter for sixty days (*i.e.*, July 1, 2022, to August 30, 2022).

The plaintiff noted in her complaint that she filed with USCIS a request to expedite the processing of her petition, which USCIS granted. *See* Compl. ¶ 10. However, as the government stated in its memorandum of law in support of its motion to dismiss, USCIS could not locate record of any request to expedite or communications regarding it. *See* ECF No. 21 at 2 n.2. Today, the government received documentation from both USCIS and the plaintiff of the request to expedite and that USCIS granted it. The government apologizes for not having this information at the time of filing its motion to dismiss. USCIS now anticipates being able to adjudicate the Form I-526 petition within sixty days, which could render this matter moot. As such, the government requests that the matter, including further briefing on the government’s motion to dismiss, be stayed for sixty days to allow USCIS time to process the petition on an expedited basis.

Plaintiff consents to this request. The Court previously granted the government’s request to stay the case due to a lapse in the statutory authorization for the Regional Center Program, under which the plaintiff filed her I-526 petition. *See* ECF Nos. 12, 14, 17.

I thank the Court for its consideration of this letter.

Respectfully submitted,

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cc: Counsel of Record (via ECF)

Application granted. Briefing on the Government's motion to dismiss shall be stayed to allow the Government to adjudicate Petitioner's petition. By no later than August 31, 2022, the Government shall submit a status update.

SO ORDERED.



Hon. Ronnie Abrams  
July 5, 2022